

Beys, Stein & Mobargha LLP

Michael P. Beys

March 1, 2012

TO BE FILED UNDER SEAL

VIA FACSIMILE (718) 613-2446

The Honorable I. Leo Glasser
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. John Doe, 98 CR 1101 (ILG);
Request to Adjourn Oral Argument

Dear Judge Glasser:

We represent defendant John Doe in the above-captioned matter. The Court has scheduled oral argument on whether to permanently enjoin non-party Richard Roe from disseminating certain sealed documents in his possession relating to Doe, for March 9, 2012 at 11:00 a.m. We are writing to request a brief adjournment of the oral argument until any day during the week of March 19, 2012 through March 23, 2012, except for the mornings of March 22, 2012 and March 23, 2012.

The basis for the adjournment request is that my partner, Nader Mobargha, Esq. who drafted and submitted our brief on behalf of Doe, will be out of town, returning on March 13, 2012. He would like to be present to argue the brief on behalf of Doe.

Also, as the Court may be aware, the parties and Roe appeared on February 27, 2012 before Judge Cogan for a civil contempt proceeding, which was adjourned until March 5, 2012. During the appearance, Judge Cogan referred Roe and his attorney, Richard Lerner, Esq., to the U.S. Attorney's Office for criminal contempt prosecution, and directed the parties to submit additional briefs on contempt and related issues. The additional briefing, criminal contempt referral and adjourned contempt proceeding are additional reasons we are requesting a brief adjournment of the oral argument.

The Chrysler Building
405 Lexington Avenue, 7th Floor
New York, New York 10174
Tel 212-387-8200
Fax 212-387-8229
mbeyes@bsmlegal.net

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I have been in contact with the Assistant U.S. Attorneys handling this matter, and they consent to this adjournment request. However, they are not available on the mornings of March 22 and 23, 2012.

Respectfully submitted,



Michael P. Beys
Counsel for John Doe

cc: The Honorable Brian M. Cogan, U.S.D.J.

Todd Kaminsky, Assistant U.S. Attorney

Evan Norris, Assistant U.S. Attorney

Richard Lerner, Esq., Counsel for Richard Roe

*Granted -
Adjourned to 2:30 p.m.
March 23rd, 2012.
So ordered
J. H. Glavin
MSB
3/1/12*